

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

**FINANCIAL EDUCATION
SERVICES, INC., *et al.*,**

Defendants.

Case No. 2:22-cv-11120

Hon. Bernard A. Friedman

**STIPULATION AND ORDER
TO EXTEND DEADLINES**

Come now Plaintiff Federal Trade Commission (“FTC”), Defendants Financial Education Services, Inc., United Wealth Services, Inc., VR-Tech, LLC, Youth Financial Literacy Foundation, and Parimal Naik (collectively, the “FES Defendants”), Defendants VR-Tech MGT, LLC, CM Rent Inc., Michael Toloff, and Christopher Toloff (collectively, the “Toloff Defendants”), and Defendant Gerald Thompson, by and through their respective counsel, and hereby stipulate and agree as follows:

1. On September 1, 2022, the Court entered its Scheduling Order for this case (ECF No. 87);
2. Since that time, the parties have made initial disclosures and engaged in written discovery;

3. Because the volume of documents related to this matter is extensive, the parties agree that an extension of the deadlines set forth in the Scheduling Order is warranted.
4. The parties have agreed upon and propose the following revised deadlines:

Discovery to be completed by	October 13 2023
Deadline for amendment of pleadings	August 4, 2023
Expert disclosures due	September 1, 2023
Rebuttal expert disclosures due	September 15, 2023
Parties to inform the Court of their intentions regarding ADR	September 1, 2023
Lay witness lists due by	September 15, 2023
Parties to complete ADR	November 13, 2023
Dispositive Motions due by	January 12, 2024
Responses to dispositive motions due by	February 9, 2024
Replies in support of dispositive motions due by	February 23, 2024
Proposed joint pretrial order due by	April 30, 2024 (or one week before Pre-Trial)
Final pretrial conference/motions in limine due by	May 7, 2024 at 1:30 p.m. (or one week before Trial date)
Bench Trial	May 14, 2024 at 9:00 a.m.

5. This stipulation is being made in good faith and at the request of all parties, and not for purposes of delay.
6. This agreement shall be without prejudice to any party

IT IS SO ORDERED.

Dated: February 16, 2023
Detroit, Michigan

s/Bernard A. Friedman
Bernard A. Friedman
Senior United States District Judge

IT IS SO STIPULATED AND AGREED.

Dated: February 14, 2023

Respectfully submitted

/s/Gregory A. Ashe

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